

Southern Nuclear
Operating Company, Inc.
42 Inverness Center Parkway
Birmingham, Alabama 35242

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ND-10-0716

FEDERAL EXPRESS

Vogtle Electric Generating Plant
Draft Air Quality Permit
Vogtle Units 3 and 4 Project

Mr. James A. Capp
Georgia Environmental Protection Division
Air Protection Branch
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

Dear Mr. Capp:

Southern Nuclear Operating Company (SNC) submitted an Air Quality Permit Application for the construction and operation of Vogtle Electric Generating Plant (VEGP) Units 3 and 4 in May 2009. The proposed project constitutes a major modification with respect to the New Source Review (NSR) Prevention of Significant Deterioration (PSD) regulations and the existing Title V Permit (Permit Number 4911-033-0030-V-02-2) under Georgia Air Rules and is thus subject to PSD review. The Georgia Environmental Protection Division, Air Protection Branch completed the review and issued the draft permit for public comments on March 7, 2010. SNC has reviewed the draft permit and provides the following comments:

Comment #1

Southern Nuclear Operating Company (SNC) requests that the testing and monitoring requirements for the ancillary generators and fire pump engines be consistent with 40 C.F.R. 60, Subpart IIII.

Permit Condition 4.2.2 requires SNC to conduct an initial compliance test for the ancillary generators and fire pump engines. Additionally, Permit Conditions 4.2.6 and 5.2.3 require SNC to develop and implement a monitoring plan for those engines. However, NSPS Subpart IIII only imposes such requirements on engines with a

displacement of greater than or equal to 30 liters per cylinder (see 40 C.F.R. 60.4204 and 60.4211). Since Subpart IIII also satisfies the requirements for 40 C.F.R. Part 63, Subpart ZZZZ for engines with a site rating of less than or equal to 500 brake horse power (see 40 C.F.R. 63.6590), owners and operators of such engines with a displacement of less than 30 liters per cylinder need only ensure that the engines are certified to the relevant emissions standards by the manufacturer in order to comply with all applicable monitoring requirements. At this time, detailed information about this equipment is unknown and will not be available until final procurement decisions are made. SNC proposes the following mechanism to address this comment.

Although the ancillary generators and the fire pump engines should have a rating of less than or equal to 500 brake horse power, as noted in SNC's permit application, SNC has not yet determined whether the engines will have a displacement of greater than or equal to 30 liters per cylinder. If the engines have a displacement of less than 30 liters per cylinder, Subpart IIII would not require the initial performance tests or monitoring plans imposed by Permit Conditions 4.2.2, 4.2.6, and 5.2.3. There is no reason to believe that the monitoring requirements of the NSPS would not be sufficient to demonstrate compliance with BACT limits in such event. Therefore, in recognition of the fact that those requirements may potentially not apply to either the ancillary generators or the fire pump engines, the following phrase should be added to the end of Permit Conditions 4.2.2, 4.2.6, and 5.2.3 to ensure consistency with Subpart IIII:

"This Condition shall not apply to any unit with a displacement of less than 30 liters per cylinder."

Comment #2

SNC requests that the following changes be made to Tables 6-4, 6-5, 6-6, 6-7, 6-8, and 6-9 of the PSD Preliminary Determination.

Based on the results of the air quality analysis submitted with the application, SNC requests the following changes for accuracy:

Table 6-4: Class II Significance Analysis Results – Comparison to SILs

Pollutant	Averaging Period	Year	UTM East (km)	UTM North (km)	Maximum Impact (ug/m ³)	SIL (ug/m ³)	Significant?
NO ₂	Annual	2006	427.100	3666.500	3.83	1	Yes
PM ₁₀	24-hour	2006	426.700	3666.700	7.10	5	Yes
	Annual	2006	427.079	3666.550	0.52	1	No
CO	1-hour	2006	430.529	3667.071	1636.39 1636.10	2000	No
	8-hour	2006	430.700 426.700	3666.700	400.46 400.18	500	No

Table 6-5: NAAQS Analysis Results

Pollutant	Averaging Period	Year	UTM East (km)	UTM North (km)	Maximum Impact (ug/m ³)	Background (ug/m ³)	Total Impact (ug/m ³)	NAAQS (ug/m ³)	Exceed NAAQS?
NO ₂	Annual	2006	429.723	3667.824	7.04 6.98	14	21.04 20.98	100	No
PM ₁₀	24-hour	2006	428.655 429.481	3665.280 3668.162	25.03 23.82	38	63.03 61.82	150	No
	Annual	2006	429.659	3667.898	4.06	20	24.06	50	No

Table 6-6: Increment Analysis Results

Pollutant	Averaging Period	Year	UTM East (km)	UTM North (km)	Maximum Impact (ug/m ³)	Increment (ug/m ³)	Exceed Increment?
NO ₂	Annual	2006	429.723 427.100	3667.824 3666.500	4.50 4.04	25	No
PM ₁₀	24-hour	2006	429.481 426.700	3668.162 3666.700	23.02 7.21	30	No
	Annual	2006	429.659	3667.898	3.30		No

Table 6-7: Significance Analysis Results – Comparison to Monitoring *De Minimis* Levels

Pollutant	Averaging Period	Year*	UTM East (km)	UTM North (km)	Monitoring De Minimis Level (ug/m ³)	Modeled Maximum Impact (ug/m ³)	Significant?
NO ₂	Annual	2006	427.100	3666.500	14	3.83	No
PM ₁₀	24-hour	2006	426.700	3666.700	10	7.10	No
CO	8-hour	2006	426.700	3666.700	575	400.46 400.18	No

Table 6-8: Class I Significance Analysis Results – Cape Romain Wilderness Area

Pollutant	Averaging Period	Year	UTM East (km)	UTM North (km)	Maximum Projected Concentration (ug/m ³)	Significance Level (ug/m ³)	Significant?
NO ₂	Annual	2006 2002	478.096 1609.918	3664.505 -633.619	0.033 4.48E-04	0.1	No
PM ₁₀	24-hour	2006 2003	426.700 1610.154	3663.459 -630.742	0.224 1.12E-02	0.3	No
	Annual	2006 2002	478.034 1610.214	3663.459 -626.955	0.011 4.44E-04	0.2	No

Table 6-9: Class I Significance Analysis Results – Wolf Island Wilderness Area

Pollutant	Averaging Period	Year	UTM East (km)	UTM North (km)	Maximum Projected Concentration (ug/m ³)	Significance Level (ug/m ³)	Significant?
NO ₂	Annual	2006 2002	441.096 1485.848	3618.654 -828.138	0.019 2.23E-04	0.1	No
PM ₁₀	24-hour	2006 2003	438.038 1489.135	3617.934 -828.508	0.085 3.95E-03	0.3	No
	Annual	2006 2002	437.040 1485.848	3617.737 -828.138	0.006 2.29E-04	0.2	No

Southern Nuclear Operating Company (SNC), as the agent for Georgia Power and other site co-owners, is responsible for all permitting and environmental support activities for the construction of VEGP Units 3 and 4. Please direct questions, comments, or requests for information associated with this Air Quality Permit Application to Mr. Dale Fulton (SNC) at (205) 992-7536 or me at (205) 992-5807. Ms. Jessica Joyner, (205) 992-7693, remains the primary contact for matters involving existing Title V permit for VEGP Units 1 and 2. Thank you for your support

Sincerely,



T. C. Moorer
Manager – Environmental Affairs, Chemistry, and Radiological Services
Southern Nuclear Operating Company

TCM/DLF:Imp

cc:

T. E. Tynan
M. K. Smith
C. R. Pierce
C. L. Buck
A. D. Mitchell
J. A. Joyner
S. S. Nance
SNC Document Services – Vogtle CVA02.003 and AR01.1053
EA File: E.05.93
EA File: E.03.93

From: "Fulton, Dale Lane" <DLFULTON@southernco.com>
To: Bradley.Belflower@dnr.state.ga.us
Date: 4/5/2010 1:36:38 PM
Subject: Vogtle Draft Air Permit

Bradley,

Below is a list of minor editorial comments I have on the draft permit. As we previously discussed we will be submitting two formal comments on the draft for your consideration on the final. My plan is to FedEx our letter to Eric Cornwell today and I will email you a copy when signed out.

Editorial Comments:

- A. Page 10, "The PM limits proposed by Plant Vogtle and in this permit are consistent with the lowest emission limits for CO." "PM" should be CO.
- B. Page 10, "The PM limits proposed by Plant Vogtle and in this permit are consistent with lowest emission limits for VOC." "PM" should be VOC.
- C. Page 11, "The PM limits proposed by Plant Vogtle and in this permit are consistent with lowest emission limits for NOx." "PM" should be NOx.
- D. Page 12, First paragraph, last sentence: Delete "drops".
- E. Page 13, Third paragraph, first sentence: Delete "for"
- F. Page 19, Second paragraph, last sentence: change "three" to two.

Let me know if you have any questions.

Thanks!!!!
Dale L. Fulton
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Southern Nuclear Operating Company

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